

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

In Re: Karen Cookson

Case No. 18-18642-MMH
Chapter 13

BSI Financial Services, INC., Movant
vs.

Karen Cookson, Debtor
Robert S. Thomas, II, Trustee
Respondent(s)

NOTICE OF DEFAULT AND NOTICE OF TERMINATION OF AUTOMATIC STAY

The Debtor has failed to comply with the Consent Order and Stipulation Modifying Automatic Stay entered April 11, 2019, in the following manner:

The Debtor should have paid regular monthly payments in the amount of \$1,821.90 per month for the months of April 2019 through July 2019 and \$1,818.58 per month for the months of August 2019 through October 2019. “Additional” monthly payments should have been made in the amount of \$2,904.68 per month for the months of April 2019 through July 2019 and \$2,904.69 for the month of August 2019 through September 2019. The debtor has paid \$0.00. The amount necessary to cure the default is therefore \$30,271.44, which includes attorney’s fees and costs in the amount of \$100.00. **All subsequent payments and late charges that come due after the filing of this notice must be included in the payment to cure the default.**

Under the provisions of the Consent Order, the stay of Section 362 (a) will terminate and the Movant will resume the foreclosure of its Deed of Trust recorded among the land records of Anne Arundel County, Maryland, and which is secured by the property of the Debtors at **1249**

Pekin Road, Pasadena, Maryland 21122, unless the default noted is cured within ten (10) days from the date this notice is filed. The Consent Order applies to proceedings for possession of the property after foreclosure.

Signed and mailed this 18th day of October, 2019.

Respectfully submitted:

/s/ Kevin Feig, Esq. (KF)
Kevin Feig, Esq.
Attorney for Movant
Bar No. 15202
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Laurel, MD 20707
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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of October, 2019 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Robert S. Thomas, II
300 E Joppa Road, Suite 409
Towson, Maryland 21286
ECF@ch13balt.com

Nicholas J. DelPizzo, III
7222 Holabird Avenue
Baltimore, Maryland 21222
njdelpizzo@aol.com

I hereby further certify that on the 18th day of October, 2019, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Karen Cookson
1249 Pekin Road
Pasadena, Maryland 21122
(Via U.S Mail)

Douglas Cookson
1249 Pekin Road
Pasadena, Maryland 21122
(Via U.S. Mail)

/s/ Kevin Feig, Esq.
Kevin Feig, Esq.